

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

May 20, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Chen:

This firm, together with Milman Labuda Law Group PLLC, represents Plaintiff IME WatchDog, Inc. (the “Plaintiff”) in the above-referenced case. Plaintiff writes to respectfully request that this Court “so Order” the enclosed Permanent Injunction on Consent entered into between Plaintiff, on the one hand, and non-parties Eugene Liddie (“Liddie”) and IME Legal Reps (“IMELR”) (Liddie and IMELR collectively hereinafter the “Non-Party Contemnors”) as part of a settlement reached between Plaintiff and the Non-Party Contemnors.

In light of the parties’ agreement, Plaintiff respectfully submits that this Court should so Order the Permanent Injunction on Consent.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
May 20, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.
Jamie S. Felsen, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1391 (direct dial)
(516) 328-0082 (facsimile)
jamiefelsen@mllaborlaw.com

Attorneys for Plaintiff
IME WatchDog, Inc.

Dated: Jamaica, New York
May 20, 2025

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq. _____

Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

Additional Attorneys for Plaintiff
IME WatchDog, Inc.

VIA ECF

All counsel of record